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Attorneys for Intervenors

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE
 COMMISSION,

Plaintiff,

vs.

MATTHEW WADE BEASLEY; BEASLEY
 LAW GROUP PC; JEFFREY J. JUDD;
 CHRISTOPHER R. HUMPHRIES; J&J
 CONSULTING SERVICES, INC., an Alaska
 Corporation; J&J CONSULTING SERVICES,
 INC., a Nevada Corporation; J AND J
 PURCHASING LLC; SHANE M. JAGER;
 JASON M. JONGEWARD; DENNY
 SEYBERT; ROLAND TANNER; LARRY
 JEFFERY; JASON A. JENNE; SETH
 JOHNSON; CHRISTOPHER M. MADSEN;
 RICHARD R. MADSEN; MARK A.
 MURPHY; CAMERON ROHNER; AND
 WARREN ROSEGREEN,

Defendants.

THE JUDD IRREVOCABLE TRUST; PAJ
 CONSULTING INC.; BJ HOLDINGS LLC;
 STIRLING CONSULTING, L.L.C.; CJ
 INVESTMENTS, LLC; JL2 INVESTMENTS,
 LLC; ROCKING HORSE PROPERTIES,
 LLC; TRIPLE THREAT BASKETBALL,
 LLC; ACAC LLC; ANTHONY MICHAEL
 ALBERTO, JR.; and MONTY CREW LLC,

Relief Defendants.

CASE NO.: 2:22-cv-00612-CDS-EJY

**UNOPPOSED MOTION FOR 7-DAY
 EXTENSIONS OF TIME TO REPLY TO
 THE SEC'S AND RECEIVER'S
 RESPONSES TO KRISTIE YOUNG'S
 AND OMID SHAHABE'S JOINT
 MOTION TO INTERVENE**

(FIRST REQUEST)

[Declaration of George W. Cochran submitted
 concurrently herewith]

Pursuant to LR IA 6-1, LR 1A 6-2, LR II 7-2 and LR II 7-3, non-parties Kristie Young and Omid Shahabe (“Proposed Intervenor”) hereby move this Honorable Court for 7-day extensions of time to reply to Receiver Goeff Winkler’s opposition (ECF No. 300) and the Securities and Exchange Commission’s response (ECF No. 303) to the motion to intervene filed on August 31, 2022 (ECF No. 281). This is Proposed Intervenor’s first motion to extend time to reply to the Receiver’s and SEC’s response to the Proposed Intervenor’s Motion to Intervene. For cause, Proposed Intervenor state that:

1. The attorney who drafted the motion to intervene has tested positive for COVID-19 and is experiencing debilitating symptoms that affect his ability to prepare the reply;
2. The responses to Proposed Intervenor’s motion raise substantively distinct arguments that require more time to address adequately.

The responding parties do not oppose their motion.

DATED this 14th day of September, 2022.

JOLLEY URGAL WOODBURY & HOLTHUS

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MEMORANDUM OF POINTS AND AUTHORITIES

Fed.R.Civ.P. 6(b)(1), like all the Federal Rules of Civil Procedure, “[is] to be liberally construed to effectuate the general purpose of seeing that cases are tried on the merits.” *Rodgers v. Watt*, 722 F.2d 456, 459 (9th Cir.1983) (quoting *Staren v. American Nat’l Bank & Trust Co. of Chicago*, 529 F.2d 1257, 1263 (7th Cir.1976)); see also Fed.R.Civ.P. 1 (“[The Federal Rules] should be construed, administered, and employed by the Court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding.”). Consequently, requests for extensions of time made before the applicable deadline has passed should “normally [] be granted in the absence of bad faith on the part of the party seeking relief or prejudice to the adverse party.” 4B Charles Alan Wright & Arthur R. Miller, *Federal Practice and Procedure* § 1165 (3d ed. 2004).

Even if Proposed Intervenor filed their motion after the deadline, the circumstances clearly demonstrate “good cause” under Rule 6(b)(1). *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010) (“Good cause” is a non-rigorous standard that has been construed broadly across procedural and statutory contexts.) Here, the principal drafter of Proposed Intervenor’s reply has declared he is cognitively impaired due to COVID-19. See Declaration of George W. Cochran filed concurrently herewith. In addition, the response briefs raise substantively distinct arguments that require more time to address than currently permitted. Since there is no indication of bad faith or prejudice and the extension is limited to 7 days,

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Proposed Intervenor respectfully submit the motion should be granted. *Ahanchian*, 624 F.3d at 1259.

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Attorneys for Intervenor

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: September 14, 2022

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